

Affidavit for Admissions

- 1.) I need the admissions to prove that. Plaintiff was in Protective Custody on 11-2-2002 until December 12, 2002.
- 2.) I need the admissions to prove that. Plaintiff was investigated by Unit Team and S.I.S. Investigation on protective custody on 11-2-2002 until December 12, 2002.
- 3.) I need the admissions to prove that. The Plaintiff comments to committee regarding incident report (306) on 12-19-02.
- 4.) I need the admissions to prove that. Plaintiff notified Unit Team and S.I.S. on the harassment of ERIC DRAYTON on November 2, 2002 until December 19, 2002.
- 5.) I need the admissions to prove that. Plaintiff administrative remedies have been exhausted.
- 6.) I need the admissions to prove that. Plaintiff told Gary Buck & T. Holt on December 20, 2002. "he won't go back to the compound because of D.C. inmates pressuring him for sex."
- 7.) I need the admissions to prove that. Plaintiff told Mr. Kindervator & Gary Buck between 11-2-2002 until 11-12, 2002. That ERIC DRAYTON and some D.C. inmates were pressuring him for sex and harassing him.
- 8.) I need the admission to prove. Plaintiff stated to (S.I.S.) and signed Statement that ERIC DRAYTON and some D.C. inmates were pressuring him for sex and harassing him.
- 9.) I need the admission to prove at trial. Plaintiff was assaulted by ERIC DRAYTON on August 29, 2003.

10.) I need the admissions to prove at trail. Plaintiff (Unit Team) had knowledge on Plaintiff in protective custody on November 2, 2002 until 12-20-2002.

11.) I need the admissions to prove. Plaintiff that all the Defendants had knowledge of plaintiff in protective custody on 11-12-2002 until 12-20-2002.

12.) I need admissions to prove. It is the routine safety at F.C.I. McKean. To keep an inmate protected from harassment. When Plaintiff notify you of harassment.

13.) I need the admissions to prove. Officer Nero ordered Plaintiff back to population on December 19, 2002.

14.) I need the admission to prove. Plaintiff was assaulted in the Education building on August 29, 2003. By inmate ERIC DRAVTON inside the classroom.

15.) I need the admissions to prove. It is the routine safety at F.C.I. McKean to keep other inmates out of the classroom. When classrooms are in session. And inmates are not suppose to bring Chemicals inside the classrooms.

16.) I need the admissions to prove. Plaintiff was transported to Bradford Regional Medical Center Emergency Department on August 29, 2003.

17.) I need the admissions to prove. Plaintiff was reviewed by DR. Rainheart after being in Protective Custody on 11-12-02.

18.) I need the admissions to prove. Plaintiff statements to S.I.S. was in writing.

(2.)

19.)

I need admissions to prove. Plaintiff notified staff of the harassment of ERIC DRAFTON before August 29, 2003.

20.) I need admissions to prove. The institution of McKean officials acted in deliberate indifference when investigating Plaintiff protective custody case on 11-12-2002 until December 20, 2002.

21.) I need admissions to prove. Plaintiff Medical Injury on August 29, 2003. By DR. OLSON is a serious Medical Injury.

22.) I need admissions to prove. The C.O's Dorian, TRAN, and Super were assigned to Unit, B.B.

23.) I need admissions to prove. Plaintiff was in Special Housing Unit. And officials put ERIC DRAFTON in the same cell with Plaintiff

Date 9-10-05 Sadrick Donaldson Proff

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